

# EXHIBIT A

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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PRO-LIFE ACTION MINISTRIES,  
LUCY MALONEY, THOMAS  
WILKIN, and DEBRA BRAUN,

Case No. 23-CV-00853 (ECT/DJF)

Plaintiffs,

**DEFENDANT'S FIRST SET OF  
REQUESTS FOR PRODUCTION  
OF DOCUMENTS**

v.

CITY OF MINNEAPOLIS, a  
Minnesota municipality,

Defendant.

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PLEASE TAKE NOTICE pursuant to Rule 34, Federal Rules of Civil Procedure, request is hereby made that Plaintiffs produce, within the time period prescribed by law, legible copies of the following.

PLEASE TAKE FURTHER NOTICE that this request is deemed to be continuing and any additional or subsequent information you receive relating to the subject matter of this discovery must be furnished to the undersigned. OBJECTION WILL BE MADE AT THE TIME OF TRIAL AGAINST ANY ATTEMPT TO INTRODUCE EVIDENCE WHICH IS DIRECTLY SOUGHT BY THIS REQUEST AND WHICH HAS NOT BEEN PREVIOUSLY DISCLOSED. Any evasive or incomplete response is deemed to be a failure to respond within the meaning of Rule

37, Federal Rules of Civil Procedure.

DEFINITIONS

1. "You" means Pro-Life Action Ministries, Lucy Maloney, Thomas Wilkin, Debra Braun, including all employees, officers, directors, agents, volunteer "sidewalk counselors" affiliated with Pro-Life Action Ministries, and attorneys of Pro-Life Action Ministries, unless another meaning is evident from the context.

2. References to Pro-Life Action Ministries include all employees, officers, directors, agents, offices, departments, and instrumentalities of Pro-Life Action Ministries, unless another meaning is evident from the context.

3. References to "Minneapolis Planned Parenthood" or "Planned Parenthood" mean the Planned Parenthood facility located at 1200 Lagoon Avenue, Minneapolis, Minnesota 55408.

4. "Parking lot" or "Planned Parenthood parking lot" means the parking lot of the Minneapolis Planned Parenthood.

5. "Driveway" means the section of the sidewalk that provides vehicular access from the street to the Minneapolis Planned Parenthood parking lot.

6. "The ordinance" means Chapter 405 of the Minneapolis Code of Ordinances.

7. The terms "include" or "including," as used herein, mean "including but not limited to."

8. "Document" includes correspondence, notes, memoranda, contracts, agreements and any and all other writings, drawings, graphs, charts, photographs, telephone records, and other data compilations from which information can be obtained and translated, if necessary, through detection devices into reasonably usable form.

9. "Amended Complaint" means Plaintiff's Amended Complaint filed in Court File No. 23-CV-00853 (ECT/DJF).

### **REQUESTS FOR PRODUCTION**

**Request No. 1:** All documents identified, referenced, used, consulted, or relied upon to answer Defendant's interrogatories.

**Request No. 2:** Any documents or other materials you offered or handed to people in or near the driveway, in the period beginning January 1, 2020, and until the enactment of the ordinance, including pamphlets; brochures; books or booklets; any other written materials; drawings, diagrams, pictures, or photographs; CDs, DVDs, or other audio or video material; figurines; "fetal models"; or any other physical object.

**Request No. 3:** Any documents or other materials you offered or handed to people in or near the driveway, in the period since the enactment of the ordinance, including pamphlets; brochures; books or booklets; any other written materials; drawings, diagrams, pictures, or photographs; CDs, DVDs, or other audio or video material; figurines; "fetal models"; or any other physical object.

**Request No. 4:** All communications between Pro-Life Action Ministries and its sidewalk counselors from January 1, 2020, to the present, including but not limited to, emails; chats; text messages; instant messages; any communication via social media; print or electronic newsletters; annual reports; mailings; fundraising materials; and event notifications or invitations.

**Request No. 5.** Copies of all issues of the two newsletters mentioned in paragraph 6 of the Amended Complaint, issued in the period from January 1, 2020, to the present.

**Request No. 6:** Any training materials, guidelines, protocols, or instructions, formal or informal (including any PowerPoint or other presentations, videos, audio recordings, scripts, agendas, written materials used to practice or role-play, tips, "Do's and Don'ts," notes, handouts, manuals, worksheets, Frequently Asked Questions or similar document, emails, texts, chats, and social media communications), used by Pro-Life Action Ministries in the three-year period before the enactment of the ordinance to train, advise, guide, or encourage Plaintiffs and/or other PLAM staff or volunteers regarding sidewalk counseling.

**Request No. 7:** All records relating to scheduling of shifts for sidewalk counselors, for the period from January 1, 2020, through the present.

**Request No. 8:** Any other document created by Plaintiffs relating to your activities at the facility or about the people or vehicles you encountered as part of your sidewalk counseling, including emails, chats, texts, social media communications, video recordings, audio recordings, photographs, shift reports or shift summaries, incident reports, debriefing documents, etc., during the period from January 1, 2020, through the present.

**Request No. 9:** Copies of all police reports; citations issued by any law enforcement official; civil or criminal complaints; harassment restraining orders, temporary injunctions, or permanent injunctions issued by any court; and any other court orders or judgments (including civil or criminal contempt orders) involving Plaintiffs or any staff or volunteers of Pro-Life Action Ministries, dated on or after January 1, 2016, relating to any interaction or contact Plaintiffs or any staff or volunteers of PLAM had with:

- any individual who was a patient or client or prospective patient or client or perceived to be a patient or client or prospective patient or client of any reproductive health facility in Minnesota;
- any individual with whom Plaintiffs or any PLAM staff or volunteers interacted at or within a 50-foot radius of any reproductive health facility in

Minnesota;

- any employee of a reproductive health facility in Minnesota; or
- any volunteer or other person affiliated with or perceived to be affiliated with a reproductive health facility in Minnesota.

**Request No. 10:** All photographs and audio or video recordings, in your possession or taken, captured, or created by you, that depict any PLAM volunteers or staff at or near the Minneapolis Planned Parenthood, at any time from January 1, 2020, to the present.

**Request No. 11:** All documents that list the names of PLAM's volunteer "sidewalk counselors," created or updated or revised on or after January 1, 2020, or maintained at any time from January 1, 2020, to the present.

**Request No. 12:** All statements made by Plaintiffs about the ordinance or about this lawsuit, including but not limited to press releases; statements posted on the PLAM website or any other website; social media communication; radio interviews; podcast interviews or episodes; emails; print or electronic newsletters; mailings; fundraising materials; and text messages.

Dated: February 6, 2024

KRISTYN ANDERSON  
City Attorney  
By

*/s/Munazza Humayun*  
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